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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 1, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket 94-18: Establishment of a Federal Advisory
Committee to Consider Electronic Filing Systems

Dear Sir:

On behalf of the Federal Communications Bar Association, and Alan C. Campbell, its president, I am herewith submitting an original and four copies of the FCBA's Comments in response to the Public Notice released March 7, 1994 in the above-referenced proceeding.

Yours very sincerely,


Lawrence J. Movshin

cc (w/enc.):

Hon. Reed E. Hundt, Chairman
Hon. James H. Quello
Hon. Andrew C Barrett
Karen E. Watson
Andrew S. Fishel
Alan R. McKie
Richard Metzger

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Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)

Establishment of a Federal)
Advisory Committee to Consider)
the Development and)
Implementation of an)
Electronic Filing System.)

CC Docket 94-18

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

COMMENTS OF FEDERAL COMMUNICATIONS BAR ASSOCIATION

The Federal Communications Bar Association ("FCBA"), pursuant to the Federal Communications Commission's Public Notice released March 7, 1994 (FCC 94-44) (the "Notice")^{1/}, respectfully submits these Comments in support of the Commission's proposal to establish a federal advisory committee to develop and implement an electronic filing system. The Advisory Committee would be formed to make recommendations concerning the computer software and hardware necessary to implement such a system; to study the feasibility of establishing an on-line public access system; and to examine the costs of such a system as well as methods for recovering those costs. The Advisory Committee would also help draft a final request for proposal for the system.

^{1/} The Notice requests comment on whether the Commission should create a federal advisory committee (the "Advisory Committee") to assist the Common Carrier Bureau in the development and implementation of an electronic filing system, and the proposed scope of that committee's deliberations. An electronic filing system would be used for Bureau applications, formal complaints, various reports, petitions, tariff filings and related documents.

The FCBA^{2/} commends the Commission for its efforts to implement an electronic filing system throughout the agency, and wholly supports the establishment of an Advisory Committee to expedite this project. FCBA members are among the most frequent "users" of the FCC's application, tariff, pleadings and public reference procedures, and they therefore have a unique perspective on the relative advantages and disadvantages of current FCC filing and retrieval procedures. Moreover, many FCBA members already employ in their workplaces the types of computer and storage technologies that the Commission has under consideration.

Members of the FCBA's Land Mobile Practice, Common Carrier Practice and Access to Records Committees are already considering the opportunities to implement and the benefits of electronic filing methods. The FCBA therefore believes that its members could provide a useful perspective in the Advisory Committee's deliberations, and would welcome the opportunity for one or more of its members to be designated to serve on the Commission's Advisory Committee.


^{2/} The FCBA is a District of Columbia non-profit, non-stock corporation originally founded in 1936. Its voting membership is comprised of more than 1,800 lawyers presently and previously involved in communications law practice. These Comments were prepared by the Association's Land Mobile Practice Committee. As with any association, the views expressed in these Comments do not necessarily represent the views of each and every member of the FCBA. Moreover, although FCC employees constitute a portion of the FCBA's membership and are represented on the FCBA's Executive Committee and its various standing committees, those members did not participate in the preparation or consideration of these Comments.

The FCBA respectfully supports the Commission's proposal to adopt an Advisory Committee, and recommends that representative members of the FCBA be appointed to serve on that committee.

Respectfully submitted,

FEDERAL COMMUNICATIONS BAR ASSOCIATION

By:



Alan C. Campbell
Its President

FCBA
1722 Eye Street, N.W.
Suite 300
Washington, D.C. 20006

Lawrence J. Movshin
Chair
FCBA Land Mobile Practice
Committee

April 1, 1994